

September 2, 2021

**BY ECF**

The Hon. A. David Copperthite  
United States District Court for the District of Maryland  
101 West Lombard Street, 8B  
Baltimore, Maryland 21201

Re: *Alfred Chestnut, et al. v. Donald Kincaid, et al.*  
Civil Action No. LKG-20-2342

Dear Judge Copperthite:

Pursuant to your Letter Order of August 9, 2021 (ECF 52), we write regarding two discovery disputes that Plaintiffs and the Individual Officer Defendants (“Individual Defendants”) have been unable to resolve despite good-faith efforts to do so.

First, there is a dispute regarding Plaintiffs’ request for color photographs from in or about 1983 of the Individual Defendants facing forward. The Individual Defendants have objected to producing such photographs. The parties met and conferred by telephone and email regarding this dispute on July 29 and August 20, 2021, but have reached an impasse.

Second, there is a dispute concerning Plaintiffs’ request for the Individual Defendants’ employment records and Defendants’ document production pursuant to this request. The parties met and conferred regarding this issue via a telephone conference on July 29 and August 31, 2021, but have been unable to resolve their dispute.

Given these two issues, Plaintiffs and the Individual Defendants respectfully request that each of them be allotted a total of five pages to set out their respective positions in submissions, to be filed within 24 hours of this letter.

Respectfully,

/s/

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Kobie A. Flowers (Bar No. 16511)  
kflowers@browngold.com  
Andrew D. Freeman (Bar No. 03867)  
adf@browngold.com  
Neel K. Lalchandani (Bar No. 20291)  
nlalchandani@browngold.com  
Chelsea J. Crawford (Bar No. 19155)  
ccrawford@browngold.com  
Anthony J. May (Bar No. 20301)  
amay@browngold.com

BROWN, GOLDSTEIN & LEVY, LLP

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Brown, Goldstein & Levy, LLP  
120 E. Baltimore Street, Suite 2500  
Baltimore, Maryland 21202  
Tel: (410) 962-1030  
Fax: (410) 385-0869

/s/

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Larry A. Nathans (Bar No. 03023)  
nathans@nathanslaw.com  
Booth M. Ripke (Bar No. 25764)  
bripke@nathanslaw.com  
Nathans & Biddle LLP  
120 E. Baltimore Street, Suite 1800  
Baltimore, Maryland 21202  
Tel: (410) 783-0272  
Fax: (410) 783-0518

*Attorneys for Plaintiffs Alfred Chestnut,  
Andrew Stewart, Jr., and Ransom Watkins*

/s/

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Avi T. Kamionski (Bar No. 20703)  
akamionski@nklawllp.com  
Shneur Nathan (Bar No. 20707)  
snathan@nklawllp.com  
Theresa Concepcion (Bar No. 21143)  
tconcepcion@nklawllp.com  
Michael J. Elliker (Bar No. 20810)  
melliker@nklawllp.com  
Jasmine R. England-Caesar (Bar No. 21515)  
jasmine@nklawllp.com  
Nathan & Kamionski LLP  
575 S. Charles Street Suite 402  
Baltimore, MD 21201  
T: (312) 612-1928

*Attorneys for Defendants William Ritz and  
Barry Verger*

BROWN, GOLDSTEIN & LEVY, LLP

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Natalie R. Amato (Bar No. 20749)  
natalie.amato@baltimorecity.gov  
Justin S. Conroy (Bar No. 28480)  
justin.conroy@baltimorepolice.org  
Kara K. Lynch (Bar No. 29351)  
kara.lynch@baltimorepolice.org  
Kyle A. Ashe (Bar No. 21551)  
kyle.ashe@baltimorepolice.org  
Baltimore City Law Department  
Office of Legal Affairs  
100 N. Holliday Street, Room 101  
Baltimore, Maryland 21202  
T: (410) 396-2495  
F: (410) 396-2126

*Attorneys for Baltimore Police Department*